

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	Civil Action No. 09-CV-06220-SAS
IN RE TRONOX, INC.)	
SECURITIES LITIGATION)	
_____)	Electronically Filed
)	
THIS DOCUMENT RELATES TO)	
ALL CLASS ACTIONS)	
_____)	

**DECLARATION OF MICHAEL JOAQUIN REGARDING MAILING OF THE NOTICE
OF PENDENCY OF CLASS ACTION AND PROPOSED SETTLEMENT,
SETTLEMENT FAIRNESS HEARING, AND MOTION FOR ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION
EXPENSES AND THE PROOF OF CLAIM AND RELEASE FORM**

I, Michael Joaquin, declare:

THE NOTICE AND PROOF OF CLAIM

1. I submit this declaration in order to provide the Court and the parties to the above-captioned litigation with supplemental information regarding the mailing of the Notice of Pendency of Class Action and Proposed Settlement, Settlement Fairness Hearing, and Motion for Attorneys' Fees and Reimbursement of Litigation Expenses (the "Notice") and the Proof of Claim and Release form (the "Proof of Claim"). I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. I am employed by Gilardi & Co. LLC ("Gilardi"), located at 3301 Kerner Blvd., San Rafael, California. Gilardi was approved as Claims Administrator for the Settlement of the above-captioned action by the Court's Order Preliminarily Approving Proposed Settlement and Providing for Notice dated August 10, 2012. Previously Carole K. Sylvester submitted a declaration regarding the mailing of the Notice and the Proof of Claim (collectively, the "Claim Package"). That declaration was dated October 15, 2012. At that time, Gilardi had mailed a total of 79,122 Claim Packages to potential Class Members and nominees.

SUBSEQUENT MAILING OF THE NOTICE AND PROOF OF CLAIM

3. Since October 15, 2012, Gilardi has mailed an additional 1,748 Claim Packages at the request of Class Members and nominees. Therefore, the total number of Claim Packages mailed to date is 80,870.

4. Since September 10, 2012, 3,074 Claim Packages of the total mailed have been returned by the United States Postal Service to Gilardi as undeliverable as addressed. Through a third-party locator service, Gilardi performed additional address searches for these potential

Class Members and was able to find updated addresses for 1,752 of these potential Class Members. These notices were promptly re-mailed. Of those re-mailed, 169 were again returned as undeliverable. Thus, as of this date, a total of 1,491 out of 80,870 were returned undeliverable and the locator service was unable to find new addresses for them.

REPORT ON REQUESTS FOR EXCLUSIONS RECEIVED

5. Paragraph 93 of the Notice informed Class Members that to exclude themselves from the Class, they were to send a written request for exclusion from the class stating that they wanted to be excluded from the Settlement, postmarked no later than October 29, 2012, addressed to *In re Tronox, Inc. Securities Litigation - EXCLUSIONS*, c/o Gilardi & Co. LLC, P.O. Box 8040, San Rafael, CA 94912-8040. I have been informed that due to inaccessibility of the Court caused by Hurricane Sandy, this deadline was extended to November 5, 2012. Gilardi has monitored all mail delivered to the Post Office Box. As of the date of this declaration, Gilardi has received fifteen requests for exclusion from the Class. A chart listing the persons who or on whose behalf exclusion from the Class was requested is attached hereto as exhibit A.

6. Although the Notice directed that any objections (as opposed to requests for exclusion) be mailed to the Clerk of the Court and to counsel for Lead Plaintiff and Defendants' counsel (*see* Notice at ¶99), Gilardi has confirmed that it has not received any objections to the Settlement or to the requested awards of attorneys' fees and expenses.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of November 2012, at San Rafael, California.



MICHAEL JOAQUIN

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered users.

/s/Solomon B. Cera

Solomon B. Cera